

September 14, 2010

Congressional Committees

**Subject: *Military Training: DOD Continues to Improve Its Report on the Sustainability of Training Ranges***

Recent operations in Iraq, Afghanistan, and other locations around the world have highlighted the need for U.S. forces to train as they intend to fight. Military training ranges provide the primary means to accomplish this goal. The Department of Defense's (DOD) training ranges vary in size from a few acres, for small arms training, to over a million acres for large maneuver exercises and weapons testing, and include broad open ocean areas for offshore training and testing. New advances in military technology to combat emerging threats in ongoing operations in Iraq, Afghanistan, and other locations around the world generate the need to continually update and maintain DOD's training ranges. Senior DOD and military service officials have reported for some time that they face increasing difficulties in carrying out realistic training at military installations due to outside influences. DOD has defined a number of factors—including air pollution, noise pollution, endangered species, critical habitats and other protected resources, and urban growth around installations—that it says encroach upon its training ranges and capabilities.

Because the military faces obstacles in acquiring new training lands, the preservation and sustainment of its current lands are a priority. Sustainable training range management focuses on practices that allow the military to manage its ranges in a way that ensures their usefulness well into the future. As required by section 366(a) of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 (as amended),<sup>1</sup> DOD was to submit a comprehensive plan for using existing authorities available to the department to address training constraints caused by limitations on the use of worldwide military lands, marine areas, and airspace to Congress in fiscal year 2004 with annual progress reports beginning in fiscal year 2005 and extending through 2013. Enclosure I includes the full text of section 366 as amended. As part of the preparation of this plan, the Secretary of Defense was to conduct an assessment of current and future training range requirements and an evaluation of the

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<sup>1</sup> Pub. L. No. 107-314 (2002). Section 366 originally required reports for fiscal years 2005 through 2008. However, this requirement was extended through 2013 by section 348 of the John Warner National Defense Authorization Act for Fiscal Year 2007, Pub. L. No. 109-364 (2006). Additionally, section 1063(c)(2) of Pub. L. No. 110-181 (2008) made a clerical amendment to section 348 of Pub. L. No. 109-364.

## Report Documentation Page

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adequacy of DOD's current range resources to meet those requirements. The plan was also to include:

- proposals to enhance training range capabilities and address any shortfalls in resources identified pursuant to that assessment and evaluation;
- goals and milestones for tracking planned actions and measuring progress;
- projected funding requirements to implement planned actions; and
- designation of an office in the Office of the Secretary of Defense and in each of the military departments responsible for overseeing implementation of the plan.

Section 366(a)(5) requires that DOD's annual reports describe the department's progress in implementing its comprehensive plan and any actions taken or to be taken to address training constraints caused by limitations on the use of military lands, marine areas, and airspace. Section 366(b) required DOD to submit a report to Congress on its plans to improve its readiness reporting system to reflect the readiness impact of certain training constraints. Section 366(c) also requires DOD to develop and maintain a training range inventory to be submitted with the President's budget for fiscal year 2004 and annual updates for 2005 through 2013. Section 366(d) further required that we evaluate the plans submitted pursuant to subsections 366(a) and (b), and submit our annual evaluations of DOD's reports to Congress within 90 days<sup>2</sup> of receiving these reports from DOD.

Although in our prior reviews of DOD's sustainable ranges reports we noted that DOD had not addressed various required elements when it initially submitted its comprehensive plan, we concluded that DOD had improved its report submissions over time and had reported on actions taken on various GAO recommendations. Enclosure II provides a complete list of our recommendations and DOD's actions in response to them. Our review of DOD's 2010 sustainable ranges report is our seventh response to section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 (as amended). In this review we discuss actions DOD reported to address two GAO recommendations made in response to prior sustainable ranges reports—specifically, that DOD develop quantifiable goals in the comprehensive plan and include in that plan projected funding estimates for range sustainment efforts.<sup>3</sup> We focus on these recommendations because DOD did not fully address them in its previously issued sustainable ranges reports. We also discuss differences between DOD's 2010 and 2009 sustainable ranges reports and opportunities to improve future ones. In accordance with the mandate, we are submitting this report to you within 90 days after having received DOD's 2010 sustainable ranges report on June 16, 2010.

## Scope and Methodology

To review actions DOD reported to address two GAO recommendations made in response to prior sustainable ranges reports, we compared the information contained in DOD's 2010 sustainable ranges report with these two recommendations. We focused on these

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<sup>2</sup> This requirement was extended from 60 days to 90 days by section 348 of Pub. L. No. 109-364 (2006).

<sup>3</sup> GAO, *Military Training: DOD's Report on the Sustainability of Training Ranges Addresses Most of the Congressional Reporting Requirements and Continues to Improve with Each Annual Update*. GAO-10-103R (Washington, D.C.: Oct. 27, 2009).

recommendations because DOD had not fully addressed them in its sustainable ranges reports. Regarding the remaining recommendations that GAO had made in response to prior sustainable ranges reports, at the time of our review, DOD had either taken action on these recommendations or was in the midst of implementing them. To determine the extent to which the 2010 sustainable ranges report differs from the 2009 submission, we compared the two reports and discussed key revisions with military and other DOD officials involved with preparing these reports. We also discussed with Office of the Secretary of Defense (OSD) officials their plans for the 2011 report submission and reviewed their data request sent to the military services in July 2010 requesting information for the 2011 report. We further discussed with these and other military officials the extent to which opportunities exist for improving future sustainable ranges report submissions. We also reviewed the extent to which DOD's sustainable ranges report has addressed the elements of subsection 366(a)(5). The intent of our review was not to comprehensively evaluate the data presented in the 2010 and 2009 sustainable ranges reports but rather to determine the extent to which the report indicated that DOD had made progress implementing prior recommendations and whether the report could be improved.

We conducted this performance audit from June 2010 through September 2010 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

### **DOD Addressed Two GAO Key Recommendations by Providing Measurable Data and Projected-Funding Estimates**

As in years past, DOD has continued to show progress in addressing our recommendations related to the elements of section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 (as amended). In 2009, we reiterated two prior recommendations that when implemented would provide Congress with specific and measurable range-sustainment goals and milestones and the funding that would be needed to address those goals.<sup>4</sup> Specifically, we recommended that DOD develop quantifiable goals in the comprehensive plan in order to better track planned actions and measure progress for implementing those actions. We also recommended that DOD include projected funding estimates of range-sustainment efforts. In the 2010 sustainable ranges report, DOD addressed these two key recommendations.

### DOD Developed Measurable Range-Sustainment Goals and Milestones and Identified OSD- and Service-Level Offices Responsible for Implementing Them

In our review of DOD's 2004 sustainable ranges report, we recommended that DOD provide quantifiable goals and milestones for tracking planned actions and measuring progress in

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<sup>4</sup> GAO, *Military Training: DOD's Report on the Sustainability of Training Ranges Addresses Most of the Congressional Reporting Requirements and Continues to Improve with Each Annual Update*. GAO-10-103R. (Washington, D.C.: Oct. 27, 2009).

future annual reports. DOD agreed with our recommendation and took steps to address it by identifying broad goals and some milestones in the 2005 sustainable ranges report. However, we reiterated this 2004 recommendation in our 2009 review because the broad goals were not measurable. The 2010 sustainable ranges report included a new set of goals that DOD states are measurable, attainable, and more closely aligned with the Integrated Product Team's<sup>5</sup> seven sustainable-ranges focus areas. As stated in the 2010 report and confirmed through our discussions with OSD officials, DOD developed this new set of goals after determining in 2009 that many of the goals and milestones used in previous reports had either been overcome by other events or outlived their relevance. The new goals are to mitigate encroachment pressures on training activities from competing operation space (land, air, sea, space, and cyber) uses; mitigate frequency spectrum competition; meet military airspace challenges; manage increasing military demand for range space, address impacts from new energy infrastructure and renewable energy impacts; anticipate climate change impacts; and environmental stewardship.

In the 2010 sustainable ranges report, DOD reports that using this new set of goals as a common framework, each military service created its own set of actions and milestones and provided dates for when each milestone is to be achieved. For example, in the 2010 report, the Navy identifies actions and milestones to address one of the new goals focused on sustaining excellence in environmental stewardship. The Navy plans to continue executing environmental-management and range-sustainability programs servicewide in accordance with applicable laws and regulations. Milestones to measure this action include renewing expiring annual Marine Mammal Protection Act authorizations; conducting an evaluation of implementation and effectiveness of integrated natural resources management plans at the end of each fiscal year; and complete ongoing environmental planning for at-sea operational areas and range complexes by the end of fiscal year 2012. By providing new goals along with service-specific actions and milestones, DOD has provided measurable data for identifying and tracking progress in mitigating encroachment in order to effectively evaluate prior efforts, thus satisfying the intent of our prior recommendation.

In addition to the new goals, actions, and milestones, DOD identified in its 2010 report a list of training range offices within OSD and each of the military services responsible for implementing the planned actions and milestones. According to military and other DOD officials, these goals, actions, and milestones will continue to be reviewed and updated annually to ensure DOD continues to effectively address training requirements as well as constraints or limitations that may arise in the future. According to DOD officials, actions will be tracked to determine how well they were executed and to measure their level of effectiveness in meeting the goal's objective. By providing measurable actions and milestones and identifying the responsible offices for tracking progress toward these actions, DOD and congressional decision makers can more accurately assess progress made toward the goal of DOD-wide training range sustainment.

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<sup>5</sup> The Sustainable Ranges Integrated Product Team's (IPT) mission is to be the DOD coordinating body responsible for oversight, development, and coordination of a comprehensive DOD response to encroachment pressures that adversely affect ranges. This IPT operates on two levels. The Overarching Integrated Product Team (OIPT) acts as the coordination forum for the development of range sustainment strategies. The Working Integrated Product Team (WIPT) works under the direction of the OIPT and meets regularly to implement the OIPT's recommendations and direction.

### DOD Included Projected Funding Estimates of Range-Sustainment Efforts

In our 2009 review, we reiterated our 2004 recommendation that DOD include funding projections of range sustainment efforts in its report. DOD concurred with our recommendation in 2004 and took some steps toward obtaining funding estimates from each of the services. For example, DOD created a Sustainable Ranges Funding Subgroup in 2004 within the Working Integrated Product Team<sup>6</sup> to develop a common framework across the military services for consistently and accurately tracking and reporting range sustainment funding. This group developed four main funding categories<sup>7</sup> as a common starting point from which to report training range sustainment data. In the 2010 sustainable ranges report, DOD provided projected-funding estimates for each of the military services for the fiscal year 2009—2015 time frame. This is the first year DOD has reported future funding estimates of its range sustainment efforts beyond the budget year. According to OSD officials, although DOD has not previously included this data in prior reports, the military services have been collecting data for projected-funding estimates since 2004. OSD officials also told us they included the data in this year's report after receiving approval to publish the information from the OSD Comptroller's Office. Each of the funding categories along with their definitions and specific examples are provided in the 2010 sustainable ranges report. According to the report, defining each of the funding categories helps ensure consistent data reporting across the services.

### **DOD Added Context in the 2010 Sustainable Ranges Report as Compared with the 2009 Report to Make Data More Meaningful and Has Efforts Under Way to Provide Context for the Data Presented in Future Reports**

According to DOD officials, significant differences between DOD's 2010 and 2009 sustainable ranges reports include the addition of measurable range-sustainment goals and milestones and the projected funding estimates of range-sustainment efforts. During our review, we noted other differences. In the 2010 sustainable ranges report, DOD provided context for the data presented there, and efforts under way to gather data for the 2011 report point toward continued emphasis on providing context for reported data. In addition, DOD summarized actions under way or planned to address training constraints and provided an update on critical issues facing the services regarding range capabilities and encroachment factors.

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<sup>6</sup> The Working Integrated Product Team also collaborates with other DOD and military service organizations to address range sustainability issues.

<sup>7</sup> The funding categories are modernization and investment; operations and maintenance; environmental; and encroachment.

DOD Provided Context for the Data Presented in the 2010 Report, and Data-Gathering Efforts for the 2011 Report Point toward a Continued Emphasis on Providing Context for Reported Data

DOD moved range-specific detail that was previously located in sustainable ranges report appendixes into the body of the 2010 report. In last year's report, DOD published range-specific detail in the report appendixes apart from the overall range encroachment and capability scores. However, in the 2010 report DOD moved this narrative into the report body in order to directly link the relevant chapter and range data with the appropriate supporting narrative. For example, the Marine Corps warfare training center in Bridgeport, California, reported a moderate overall encroachment score per this year's report. Specific examples of factors that contribute to that encroachment—such as restrictions on the use of land adjacent to the warfare training center—are explained in a comment section directly linked to the encroachment score. Our review found that the information provided in the report body provides the reader with a more direct link between a range's assessment and the factors that contribute to a range's overall capability and encroachment score.

The 2010 sustainable ranges report also included a new success-stories section highlighting significant areas of progress in mitigating encroachment. For example, as part of the Army Compatible Use Buffer Program,<sup>8</sup> the Army partnered with groups including the Conservation Fund, the Nature Conservancy, and the U.S. Fish and Wildlife Service to put nearly 3,000 acres of land into conservation easements near Fort A.P. Hill, Virginia. The report states this buffer preserves the installation's training mission while also conserving valuable wildlife habitat and sensitive natural and cultural resources.

According to officials from OSD and the military services, actions and milestones identified in the 2010 report will be continuously revised and updated in the 2011 report. DOD officials hosted a workshop in June 2010 to begin data collection for the 2011 report. DOD expects to issue its next sustainable ranges report by February 2011. As in years past, development of the 2011 report will involve initial staff level inputs, coordination through the Sustainable Ranges Integrated Product Team, and formal coordination with the services and OSD. Plans for next year's sustainable ranges report also include providing more information about the relationship between range data and the installations reports feeding into the Defense Readiness Reporting System.<sup>9</sup> This information will include encroachment and capability data regarding individual installations.

According to the data input request OSD sent to the military services for the 2011 report, OSD expanded the data entry and analysis process. OSD instructed the services to provide a clearer level of detail and comments regarding whether the range complex's capabilities or encroachment pressures have been improving or degrading, as well as future projections. In

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<sup>8</sup> The Army Compatible Use Buffer program is used by the Army to enter into cooperative agreements with partners to create buffer zones around at-risk testing or training ranges while simultaneously protecting natural resources.

<sup>9</sup> In 2002, DOD Directive 7730.65, *Department of Defense Readiness Reporting System (DRRS)*, established the Defense Readiness Reporting System to measure and report on the readiness of military forces and the supporting infrastructure to meet missions and goals assigned by the Secretary of Defense.

other words, OSD requested the services to provide more detailed historical information on factors that contribute to a range's overall capability or encroachment score. Further, OSD requested the services to provide future projections of a range's overall encroachment and capability scores and more detailed information on potential changes to the scores in future years. Potential changes could be due to a variety of circumstances, such as improved accuracy in the range assessment data or changes in encroachment pressures. By requesting more details regarding historical information and future projections of a range's overall encroachment or capability score, OSD and the military services may have a better understanding of why a range has a certain score so that it can better mitigate encroachment and reduce training constraints.

OSD and Army officials agreed that trend analysis of range data collected over multiple years could also improve future reports by providing a more comprehensive understanding of a range's capability or encroachment score, rather than displaying the data as a snapshot in time. An OSD official also told us the Integrated Product Team is working to improve direct correlation between encroachment assessments in the 2011 sustainable ranges report, and the requests being made by military services for funds through the Readiness and Environmental Protection Initiative.<sup>10</sup> For example, he said that if the report assesses a certain training range with a low capability or encroachment score, the Integrated Product Team wants to ensure that the military service owning the range is requesting appropriate funds through the Readiness and Environmental Protection Initiative to improve those ranges. However, an Army official told us such a correlation may be difficult because the range assessment process is currently based on data collected as a snapshot in time. The official stated this does not provide the cumulative bigger picture or show how much progress the Army, for instance, has made since the report's inception. A snapshot in time does not allow for a broader view of what the Army is doing to mitigate encroachment. For example, if a particular training range reports severe encroachment year after year, it may imply the military service is not working to mitigate the encroachment. However, if the assessment is based on an endangered species law, the service can do little to reverse this effect, regardless of the funding that might be available. OSD and Army officials agree that using range data to perform trend analysis could help prevent potential misconceptions and provide a more comprehensive understanding of what the range's capability and encroachment score means.

DOD Reported Progress, Summarized Actions to Address Training Constraints, and Provided an Update on Critical Issues Facing the Services Regarding Range Capabilities and Encroachment Factors

DOD reported progress in implementing its comprehensive plan as required by section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 (as amended),<sup>11</sup>

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<sup>10</sup> The Readiness and Environmental Protection Initiative provides oversight for and helps fund military installations' compatible land use partnerships and projects. Readiness and Environmental Protection Initiative is an important tool for creating buffer zones around military installations.

<sup>11</sup> Pub. L. No. 107-314 (2002). Section 366 originally required reports for fiscal years 2005 through 2008. However, this requirement was extended through 2013 by section 348 of the John Warner National Defense

by providing new goals, actions, and milestones for this plan as described above. DOD also reported actions taken or to be taken to address training constraints caused by limitations on the use of military lands, marine areas, and airspace. For example, in the 2010 range assessments, all four of the military services reported increased range capability scores. Also, according to the 2010 sustainable ranges report, regional partnerships have enabled DOD to work successfully with multistate, multiagency teams to address substantial sustainability issues. For example, OSD and military service officials stated that renewable energy development has the potential to significantly impact their ability to train and is a growing area of concern. Coordination with these regional partnerships<sup>12</sup> has allowed DOD to identify and address renewable energy development by seeking compatible land uses that are mutually beneficial to all concerned parties. By forming these partnerships, DOD has taken steps to prevent conflicts between military training and proposed renewable energy development.

DOD's 2010 sustainable ranges report also includes additional updates to the special interest section for each of the services. The special interest section briefly highlights critical issues facing the services regarding range capabilities and encroachment factors. For example, this year the Air Force provides information about the integration of unmanned aerial systems into existing airspace and its efforts to increase flight safety. We previously reported that by highlighting its most pressing range sustainability issues, DOD officials can begin to prioritize the department's actions to address range issues in the most efficient and effective manner. DOD officials told us the sustainable ranges report will continue to include annual updates to the special interest section regarding general issues relevant to the report.

### **Agency Comments**

In commenting on a draft of this report, DOD concurred with the findings. DOD's comments are included in their entirety in enclosure III. DOD also provided technical comments, which we have incorporated into this report as appropriate.

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We are sending copies of this report to the Secretary of Defense; the Secretaries of the Army, the Navy, and the Air Force; the Commandant of the Marine Corps; the Director, Office of Management and Budget, and interested congressional committees. In addition, this report will be available at no charge on our Web site at <http://www.gao.gov>.

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Authorization Act for Fiscal Year 2007, Pub. L. No. 109-364 (2006). Additionally, section 1063(c)(2) of Pub. L. No. 110-181 (2008) made a clerical amendment to section 348 of Pub. L. No. 109-364.

<sup>12</sup> DOD's regional partnerships include the Western Regional Partnership and the Southeast Regional Partnership for Planning and Sustainability.

If you or your staff have any questions about this report, please contact me at (202) 512-4523 or [leporeb@gao.gov](mailto:leporeb@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report include James Reifsnyder, Assistant Director; Courtney Reid; Jena Whitley; Alex Wise; Michael Willems; and Mae Jones.

A handwritten signature in black ink, appearing to read "Brian Lepore".

Brian J. Lepore, Director  
Defense Capabilities and Management

*List of Committees*

The Honorable Carl Levin  
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Committee on Armed Services  
United States Senate

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## Enclosure I

### **Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 (as amended)<sup>13</sup>**

SEC. 366. Training Range Sustainment Plan, Global Status of Resources and Training System, and Training Range Inventory.

(a) PLAN REQUIRED—(1) The Secretary of Defense shall develop a comprehensive plan for using existing authorities available to the Secretary of Defense and the Secretaries of the military departments to address training constraints caused by limitations on the use of military lands, marine areas, and airspace that are available in the United States and overseas for training of the Armed Forces.

(2) As part of the preparation of the plan, the Secretary of Defense shall conduct the following:

(A) An assessment of current and future training range requirements of the Armed Forces.

(B) An evaluation of the adequacy of current Department of Defense resources (including virtual and constructive training assets as well as military lands, marine areas, and airspace available in the United States and overseas) to meet those current and future training range requirements.

(3) The plan shall include the following:

(A) Proposals to enhance training range capabilities and address any shortfalls in current Department of Defense resources identified pursuant to the assessment and evaluation conducted under paragraph (2).

(B) Goals and milestones for tracking planned actions and measuring progress.

(C) Projected funding requirements for implementing planned actions.

(D) Designation of an office in the Office of the Secretary of Defense and in each of the military departments that will have lead responsibility for overseeing implementation of the plan.

(4) At the same time as the President submits to Congress the budget for fiscal year 2004, the Secretary of Defense shall submit to Congress a report describing the progress made in implementing this subsection, including—

(A) the plan developed under paragraph (1);

(B) the results of the assessment and evaluation conducted under paragraph (2); and

(C) any recommendations that the Secretary may have for legislative or regulatory changes to address training constraints identified pursuant to this section.

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<sup>13</sup> Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 was amended by Pub. L. No. 109-364, § 348 (2006); and Pub. L. No. 110-181, § 1063(c)(2) (2008).

(5) At the same time as the President submits to Congress the budget for each of fiscal years 2005 through 2013, the Secretary shall submit to Congress a report describing the progress made in implementing the plan and any additional actions taken, or to be taken, to address training constraints caused by limitations on the use of military lands, marine areas, and airspace.

(b) READINESS REPORTING IMPROVEMENT---Not later than June 30, 2003, the Secretary of Defense, using existing measures within the authority of the Secretary, shall submit to Congress a report on the plans of the Department of Defense to improve the Global Status of Resources and Training System to reflect the readiness impact that training constraints caused by limitations on the use of military lands, marine areas, and airspace have on specific units of the Armed Forces.

(c) TRAINING RANGE INVENTORY--- (1) The Secretary of Defense shall develop and maintain a training range inventory for each of the Armed Forces—

(A) to identify all available operational training ranges;

(B) to identify all training capacities and capabilities available at each training range; and

(C) to identify training constraints caused by limitations on the use of military lands, marine areas, and airspace at each training range.

(2) The Secretary of Defense shall submit an initial inventory to Congress at the same time as the President submits the budget for fiscal year 2004 and shall submit an updated inventory to Congress at the same time as the President submits the budget for fiscal years 2005 through 2013.

(d) GAO EVALUATION----The Secretary of Defense shall transmit copies of each report required by subsections (a) and (b) to the Comptroller General. Within 90 days after receiving a report, the Comptroller General shall submit to Congress an evaluation of the report.

(e) ARMED FORCES DEFINED -- In this section, the term “Armed Forces” means the Army, Navy, Air Force and Marine Corps.

## Enclosure II

### List of Prior GAO Reviews and Recommendations, and DOD Action to Date

**GAO-10-103R: DOD's Report on Sustainability of Training Ranges Addresses Most of the Congressional Reporting Requirements and Continues to Improve with Each Annual Update (October 27, 2009)**

GAO recommendation	Original DOD response	DOD actions
Because our prior recommendation for quantifiable goals and milestones for tracking planned actions and measuring progress and our recommendation for projecting funding requirements to more fully address training constraints remain open, we did not make new recommendations in this report.	N/A	N/A

**GAO-09-128R: Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan (December 15, 2008)**

GAO recommendation	Original DOD response	DOD actions
Include each service's rationale for excluding the specific training ranges not included in its assessment of the adequacy of current resources to meet requirements in future sustainable ranges reports.	<b>Concur.</b> Future reports will incorporate rationale as to why some ranges may be included in the inventory, yet not have a capability or encroachment assessment performed.	DOD's included in its 2009 report the rationale for excluding some Army and Marine Corps range assessments. In 2010, DOD extended this rationale to all service ranges not assessed in the report.
Include the Marine Corps' individual combat training elements as the mission areas in the range capability and encroachment assessment in future sustainable ranges reports.	<b>Did not concur.</b> The Marine Corps' approach to assessing range capability and encroachment is consistent with all the source documents and methodologies by which the Marine Corps manages and resources its ranges. The capabilities assessments are designed to measure the ranges' ability to support the levels of training on the Marine Corps training continuum. Those levels of training are all based on established training responsibilities embodied in Marine Corps Tasks. In future reports, they will provide greater explanatory comments on both capabilities and encroachment impacts, but the framework established in their Required Range Capabilities Document, range complex management plans, and range management orders all support the methodology they have employed in this report.	No further changes were made since our last review of the sustainable ranges report found that the Marine Corps' mission areas have remained the same. In regard to the 2009 sustainable ranges report, DOD stated that greater explanatory comments on impacts to training were provided in the Special Interest section of Chapter 3 and Appendix C for all services. DOD officials had also stated that the Marine Corps is considering how best to provide future assessments to include greater detail in response to an increased emphasis on developing consistent measures for DOD readiness reporting.

GAO recommendation	Original DOD response	DOD actions
Update on the actions taken by the Air Force to address DOD's modernization and investment goals for range sustainment in future sustainable ranges reports.	<b>Concur.</b> Updates of actions taken by each Service over the proceeding year towards completion of goals and milestones will be addressed.	This year's report includes a list of seven new goals which align with the seven sustainable ranges Integrated Product Team (IPT) focus areas. Therefore the update to the modernization and investment goal is no longer applicable. The Air Force has provided actions and milestones with measurable end dates for all of the new goals except for mitigating frequency spectrum competition which is to be determined. An Air Force official stated that actions and milestones toward this goal will be included in the 2011 ranges report.
Include a detailed description of all funding data included in each funding category, for each of the military services in future sustainable ranges reports.	<b>Concur.</b> The Office of the Secretary of Defense will work with the Services to provide a more detailed description of what areas are financed within each of the funding categories.	No further changes have been made since DOD included a table with specific examples for each of the four funding categories in their 2009 sustainable ranges report.

**GAO-08-10R: *Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan* (October 11, 2007)**

GAO recommendation	Original DOD response	DOD actions
Develop clear criteria and standard methods for assessing current and future training range requirements and capabilities.	<b>Concur.</b> Will continue to develop and improve the criteria and methodology associated with our range requirements and capabilities assessment processes in our subsequent reports.	No further changes were found since DOD established standardized criteria and identified common factors to assess range capabilities and encroachment in the 2008 sustainable ranges report.
Include funding information on the services' range sustainment efforts in funding reports.	<b>Concur.</b> Programming funding data associated with range sustainment will be captured and documented in future Sustainable Ranges Reports to Congress to the extent possible. However, any funding data presented beyond the current year will be subject to a caveat that final Service budgets for out years are subject to change.	DOD's 2010 report provides training range funding projections through fiscal year 2015. Additionally, footnotes to the table provide explanation as to how some funding requirements are determined.

**GAO-06-725R: *Improvement Continues in DOD's Reporting on Sustainable Ranges but Additional Time Is Needed to Fully Implement Key Initiatives* (June 20, 2006)**

GAO recommendation	Original DOD response	DOD actions
Because our previous recommendations remained open, we did not recommend any new executive actions in this report.	<b>N/A</b>	<b>N/A</b>

**GAO-06-29R: Some Improvements Have Been Made in DOD's Annual Training Range Reporting but It Still Fails to Fully Address Congressional Requirements (Oct. 25, 2005)**

GAO recommendation	Original DOD response	DOD actions
Because our prior recommendations for improving the Office of the Secretary of Defense's annual training range reporting remained open, valid, and not fully addressed, we did not make new recommendations in this report.	N/A	N/A

**GAO-04-608: MILITARY TRAINING: DOD Report on Training Ranges Does Not Fully Address Congressional Reporting Requirements (June 4, 2004)**

GAO recommendation	Original DOD response	DOD actions
Develop an integrated training range database that identifies available training resources, specific capacities and capabilities, and training constraints caused by limitations on the use of training ranges, which could be continuously updated and shared among the Services at all command levels, regardless of Service ownership.	<b>Did not concur.</b> Each military service already processes and is improving range information systems that address the features described in this recommendation. Further, the Department agrees that, as a long-term goal these systems should be linked to support joint use. It is DOD policy to document encroachment concerns and environmental considerations and improve information systems related to range management. The services and the Office of the Secretary of Defense are moving forward in a deliberate approach that builds on existing systems and carefully manages the costs and risks inherent in information system integration and development. As part of our yearly Section 366 reports, the Department will document progress in this evolutionary effort to link and improve the Service range information systems. However, the department non-concurs with the recommendation ... It must be recognized that each Service operates ranges to meet specific training requirements. While increased cross-Service or cross-functional use is a DOD goal, it does not resolve training constraints brought about by encroachment.	According to DOD officials, the Range Assessment Module (RAM) has been incorporated into the Defense Readiness Reporting System. DOD is currently updating RAM to provide the module user with a strategic look at how ranges are being used and allow unit commanders the ability to leave feedback regarding range capabilities.

GAO recommendation	Original DOD response	DOD actions
Develop a comprehensive plan, which includes quantifiable goals and milestones for tracking planned actions and measuring progress, and projected funding requirements to more fully address identified training constraints.	<p><b>Concur.</b> Meeting section 366 requirements can be accomplished only through a long-term approach. Under the Office of the Secretary of Defense leadership, each of the military services has initiated an enhanced range management and comprehensive planning process, as an integral element of expanding range sustainability programs. In line with this evolution, future reports will more fully address goals and milestones and project funding requirements associated with these comprehensive plans. The department is and will continue to execute a comprehensive program to improve sustainability of its ranges, and disagrees with the implication in this recommendation that it does not.</p>	<p>The 2010 sustainable ranges report has seven new goals that are measurable, attainable, and more in line with the Integrated Product Team's focus areas. The report outlines which offices in each of the military services are responsible for actions needed to achieve each milestone. The report also outlines actions and milestones for each service to meet a particular goal; and provide measurable dates for when each milestone is to be accomplished. DOD officials stated that actions will be reviewed and updated as necessary during monthly Working Integrated Product Team meetings. Additionally, the report provides training range funding projections through fiscal year 2015.</p>
Assess current and future training range requirements and evaluate the adequacy of current resources to meet these requirements.	<p><b>Did not concur.</b> The Department has begun a program to better define range requirements. Because a valid requirements base must be a bottom-up process, this effort entails detailed work at each installation. It is unclear why GAO chose to not examine these efforts. Also, it is both impractical and inappropriate to include this level of detail in an OSD-level report. DOD believes that the Congress is better served if the Department describes, summarizes, and analyzes training requirements in its Section 366 report, rather than simply providing the requirements themselves.</p>	<p>According to DOD and military service officials, a Sustainable Ranges Funding Subgroup was formed in 2004 and four main funding categories were defined and agreed upon by each of the military services. DOD noted in this year's sustainable ranges report that future funding will necessarily be subject to change and is presented for planning purposes only.</p>
Develop a readiness reporting system to reflect the impact on readiness caused by training constraints due to limitations on the use of training ranges.	<p><b>Did not concur.</b> The Department stated that it is inappropriate to modify the Global Status of Resources Training System report to address encroachment. DOD believes it is best to assess how encroachment impacts affect the ability of installations and ranges to conduct training and testing. DOD plans to incorporate encroachment impacts on readiness into the Defense Readiness Reporting System (DRRS), which is currently under development.</p>	<p>According to DOD officials, DRRS is operational and incorporates the capability and encroachment assessments for training contained in the sustainable ranges report. Currently the Range Assessment Module (RAM) shows information at the unit-level. RAM is continuing to be updated in an effort to provide the end-user with a more strategic assessment of individual range capabilities.</p>

Sources: GAO and DOD.

## Enclosure III

### Comments from the Department of Defense



PERSONNEL AND  
READINESS

OFFICE OF THE UNDER SECRETARY OF DEFENSE  
4000 DEFENSE PENTAGON  
WASHINGTON, D.C. 20301-4000

SEP 2 2010

Mr. Brian J. Lepore  
Director, Defense Capabilities and Management  
U.S. Government Accountability Office  
441 G Street, N.W.  
Washington, DC 20548

Dear Mr. Lepore:

This is the Department of Defense (DoD) response to the Government Accountability Office Draft Report GAO-10-977R, "Military Training: DoD Continues to Improve Its Report on the Sustainability of Training Ranges," dated August 13, 2010 (GAO Code 351479).

Thank you for the opportunity to comment on this draft. The DoD appreciates the opportunity to work with the GAO to continually improve reporting on the ability of our training ranges to meet the needs of the warfighter. The Department agrees in general with the report and has no specific comments.

Sincerely,



Samuel D. Kleinman  
Deputy Under Secretary of Defense  
(Readiness)

## Related GAO Products

*Military Training: DOD's Report on the Sustainability of Training Ranges Addresses Most of the Congressional Reporting Requirements and Continues to Improve with Each Annual Update.* GAO-10-103R. Washington, D.C.: October 27, 2009.

*Military Training: Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan.* GAO-09-128R. Washington, D.C.: December 15, 2008.

*Military Training: Compliance with Environmental Laws Affects Some Training Activities, but DOD Has Not Made a Sound Business Case for Additional Environmental Exemptions.* GAO-08-407. Washington, D.C.: March 7, 2008.

*Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan.* GAO-08-10R. Washington, D.C.: October 11, 2007.

*Improvement Continues in DOD's Reporting on Sustainable Ranges, but Additional Time Is Needed to Fully Implement Key Initiatives.* GAO-06-725R. Washington, D.C.: June 20, 2006.

*Military Training: Funding Requests for Joint Urban Operations Training and Facilities Should Be Based on Sound Strategy and Requirements.* GAO-06-193. Washington, D.C.: December 8, 2005.

*Some Improvements Have Been Made in DOD's Annual Training Range Reporting but It Still Fails to Fully Address Congressional Requirements.* GAO-06-29R. Washington, D.C.: October 25, 2005.

*Military Training: Actions Needed to Enhance DOD's Program to Transform Joint Training.* GAO-05-548. Washington, D.C.: June 21, 2005.

*Military Training: Better Planning and Funding Priority Needed to Improve Conditions of Military Training Ranges.* GAO-05-534. Washington, D.C.: June 10, 2005.

*Military Training: DOD Report on Training Ranges Does Not Fully Address Congressional Reporting Requirements.* GAO-04-608. Washington, D.C.: June 4, 2004.

*Military Training: Implementation Strategy Needed to Increase Interagency Management for Endangered Species Affecting Training Ranges.* GAO-03-976. Washington, D.C.: September 29, 2003.

*Military Training: DOD Approach to Managing Encroachment on Training Ranges Still Evolving.* GAO-03-621T. Washington, D.C.: April 2, 2003.

*Military Training: DOD Lacks a Comprehensive Plan to Manage Encroachment on Training Ranges.* GAO-02-614. Washington, D.C.: June 11, 2002.

*Military Training: DOD Needs a Comprehensive Plan to Manage Encroachment on Training Ranges.* GAO-02-727T. Washington, D.C.: May 16, 2002.

*Military Training: Limitations Exist Overseas but Are Not Reflected in Readiness Reporting.* GAO-02-525. Washington, D.C.: April 30, 2002.

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